



**MEMORANDUM**

To: Rep. Rob Nosse, Chair, House Behavioral Health and Health Care Committee  
Rep. Travis Nelson, Vice-Chair, House Behavioral Health and Health Care Committee  
Rep. Cyrus Javadi, Vice-Chair, House Behavioral Health and Health Care Committee  
Members of the House Behavioral Health and Health Care Committee

From: Courtni Dresser, Vice President of Government Relations

Date: February 11, 2025

Re: OMA Comments on HB 3439

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The Oregon Medical Association (OMA) engages in advocacy, policy, and community for over 7,000 physicians, physician associates, and medical and PA students in Oregon. The association serves and supports members in their efforts to practice medicine better, improve the health of Oregonians and provide the best care for their patients.

We appreciate the opportunity to provide testimony regarding House Bill 3439. While we acknowledge the valuable role that naturopathic physicians play in Oregon's healthcare system, we have significant concerns about the provisions of HB 3439, particularly considering the substantial differences in education and training between naturopathic physicians and medical doctors (MDs) or doctors of osteopathy (DOs)

Medical Doctors (MDs) and Doctors of Osteopathy (DOs) undergo extensive education and training to ensure they are equipped to provide high-quality medical care. They begin with the completion of a four-year undergraduate degree with a strong emphasis on pre-medical courses, followed by four years of rigorous education at accredited medical schools, where they accumulate approximately 9,000 hours of lectures, clinical study, laboratory work, and direct patient care. After medical school, they enter mandatory residency programs lasting between 3 to 7 years, during which they receive in-depth, supervised clinical experience in various specialties. To practice independently, they must successfully complete the United States Medical Licensing Examination (USMLE) Steps 1, 2, and 3, and many go on to obtain board certification in their chosen specialty, further demonstrating their expertise and commitment to patient care.

Naturopathic Physicians (NDs) complete a four-year undergraduate degree, often including pre-medical courses, before attending a four-year program at an accredited naturopathic medical school. Their education emphasizes holistic and non-toxic approaches to therapy, with a strong focus on disease prevention and wellness optimization. However, they are not mandated to do a residency program. To practice, graduates must pass the Naturopathic Physicians Licensing Examinations (NPLEX), which assess their knowledge and competencies in naturopathic medicine.

While we respect the contributions of naturopathic physicians, it is crucial to recognize that the depth and breadth of training between NDs and MDs/DOs are not equivalent. The extensive education and residency training undertaken by MDs and DOs equip them to manage complex medical conditions, make critical decisions in high-pressure environments, and provide comprehensive care that encompasses a wide range of medical interventions.

Equating reimbursement rates without considering these differences may inadvertently suggest parity in training and expertise, which could lead to patient confusion and potential safety concerns. It is essential to ensure that reimbursement structures reflect the varying levels of training and the scope of practice inherent to each type of healthcare provider.

The OMA values the role of naturopathic physicians within our healthcare system and supports collaborative, integrative approaches to patient care. However, we urge the committee to consider the significant differences in education and training when deliberating on HB 3439. Reimbursement policies should align with the provider's level of training, expertise, and scope of practice to maintain the highest standards of patient care and safety.

**The Oregon Medical Association (OMA) is the state's largest professional organization engaging in advocacy, policy, community-building, and networking opportunities for Oregon's physicians, physician associates medical students, and physician associate students. The OMA's members speak**

with one voice as they advocate for policies that improve access to quality patient care, reduce administrative burdens on medical professionals, and improve the health of all Oregonians. Additional information can be found at [www.theOMA.org](http://www.theOMA.org).